## Case #3 1122 row 001007/22 CCPREB | D0000cum rentt 2 # Filed 007/1/116/1122 | PPagged 106/43

I.			
1	PAUL L. REIN, Esq. (SBN 43053) CELIA McGUINNESS, Esq. (SBN 159420) CATHERINE M. CABALO, Esq. (SBN 248198) LAW OFFICES OF PAUL L. REIN 200 Lakeside Drive, Suite A Oakland, CA 94612		
2	CATHERINE M. CABALO, Esq. (SBN 248198) LAW OFFICES OF PAUL L. REIN		
3	200 Lakeside Drive, Suite A Oakland, CA 94612		
4	Facsimile: 510/832-4787		
5	reinlawoffice@aol.com Attorneys for Plaintiff		
6 7	FRANCISCA MORALEZ		
8	HAVIEVS GRUNVALD Cal Bar No. 227909		
9	SHEPPARD, MULLIN, RICHTER & HAMPTON LLP 501 West Broadway, 19th Floor		
10	hgrunvald@sheppardmullin.com SHEPPARD, MULLIN, RICHTER & HAMPTON LLP 501 West Broadway, 19th Floor San Diego, California 92101 Telephone: 619-338-6500 Facsimile: 619-234-3815		
11			
12	Attorneys for Defendant WHOLE FOODS MARKET CALIFORNIA, INC.		
13	MICHAEL A. TAITELMAN (SBN 156254) mtaitelman@ftllp.com		
14	jACQUELINE C. BROWN (SBN 177970) jbrown@ftllp.com FREEDMAN & TAITELMAN, LLP		
15			
16	Tel.: (310) 201-0005		
17	Fax: (310) 201-0045		
18	BOND CC OAKLAND, LLC		
19			
20 21	IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA		
22	FRANCISCA MORALEZ	CASE NO. C12-01072 CRB	
23	Plaintiffs,	Civil Rights	
24	V.	STIPULATION AND	
25	WHOLE FOODS MARKET	[PROPOSED] ORDER TO EXTEND BRIEFING	
26	CALIFORNIA, INC.; BOND CC OAKLAND LLC; and DOES 1-10,	SCHEDULE FOR DEFENDANTS' RULE 12(b)(6) MOTION TO DISMISS	
27	Inclusive,	DISMISS	
28	Defendants.		

LAW OFFICES OF **PAUL L. REIN** 200 LAKESIDE DR., SUITE A OAKLAND, CA 94612-3503 (510) 832-5001

**STIPULATION** 1 Plaintiff FRANCISCA MORALEZ and Defendants WHOLE FOODS 2 MARKET CALIFORNIA, INC. and BOND CC OAKLAND, LLC, by and 3 through their respective attorneys of record, stipulate and request that the Court 4 5 grant an extension of the briefing deadlines for defendants' Rule 12(b)(6) motion to dismiss (Docket No. 20) by one week, rescheduling plaintiff's Opposition 6 deadline to July 23, 2012, and defendants' Reply to July 30, 2012. The parties 7 do so based on the following good cause: 8 1. WHEREAS this action was filed by Plaintiff Francisca Moralez on 9 March 2, 2012, and all defendants have been served; 10 Whereas plaintiff stipulated to a 30 day extension for defendants to 2. 11 respond to the Complaint and the Court granted the extension on May 8, 12 2012; 13 Whereas the plaintiff filed her First Amended Complaint as a matter of 14 3. course on May 10, 2012 pursuant to FRCP Rule 15; 15 Whereas this is plaintiff's first request for an extension of time; 4. 16 5. NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the 17 parties, through their counsel, that this Court should reschedule plaintiff's 18 Opposition deadline to defendants' Rule 12(b)(6) motion to July 23, 2012, 19 and defendants' Reply to July 30, 2012. 20 21 Dated: July 10, 2012 LAW OFFICES OF PAUL L. REIN 22 23 24 25 Attorneys for Plaintiff FRANCISCA MORALEZ 26

LAW OFFICES OF **PAUL L. REIN**200 LAKESIDE DR., SUITE A OAKLAND, CA 94612-3503
(510) 832-5001

27

28

## 

1 2	Dated: July 11, 2012 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP	
3		
4	/s/ Haleu S. Grunvald By HAYLEY S. GRUNVALD	
5	Attorneys for Defendant WHOLE FOODS MARKET	
6	CALIFORNIA, INC.	
7		
8	Dated: July 11, 2012 FREEDMAN & TAITELMAN, LLP	
9		
10	/s/ Jacqueline C. Brown By JACQUELINE C. BROWN	
11	Attorneys for Defendant BOND CC OAKLAND, LLC	
12	BOND CC OTHERWO, EEC	
13		
14	<u>ORDER</u>	
15	Having reviewed and considered the above stipulation of the parties, and	
16	good cause appearing, IT IS SO ORDERED that the deadline for plaintiff's	
17	Opposition to defendants' Rule 12(b)(6) motion to dismiss is July 23, 2012, and	
18	defendants' Reply is due July 30, 2012.	
19		
20	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
21		
22	Dated: July 13, 2012	
23	DISTR	
24	STATES DISTRICT COL	
25	HON ON IT IS SO ORDERED	
26		
27	UNITED S  Judge Charles R. Breyer  Judge Charles R. Breyer	
28		

LAW OFFICES OF **PAUL L. REIN** 200 LAKESIDE DR., SUITE A OAKLAND, CA 94612-3503 (510) 832-5001

STIPULATION AND [PROPOSED] ORDER TO EXTEND BRIEFING SCHEDULE FOR DEFENDANTS' RULE 12(b)(6) MOTION TO DISMISS CASE NO. C12-01072 CRB

RNDISTRICT